

**PX27**

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE

KATHERINE O'HAVER,  
Plaintiff.

v.

ANESTHESIA ASSOCIATES OF  
KANSAS CITY, P.C., et al.,  
Defendants.

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Case No. 1816-CV30710

DEPOSITION OF  
JOHN P. ABRAHAM, Ph.D.

Pages 1 to 331

The following is the deposition of  
JOHN P. ABRAHAM, Ph.D., taken on May 16, 2022,  
commencing at 9:36 a.m., at 1616 Park Avenue,  
Minneapolis, Minnesota 55404, before Merilee S.  
Johnson, Registered Diplomate Reporter, Certified  
Realtime Reporter, Realtime Systems Administrator,  
and Notary Public of and for the State of  
Minnesota.

1 the room and the temperature in the room compared  
2 to the adjoining spaces, like the hallways or  
3 adjacent rooms.

4 Those are some of the things that come into  
5 my mind, but my report and my testimony were  
6 probably more exhaustive.

7 Q. Okay. And I recall you testifying that the  
8 CFD you performed was specific to the OR at  
9 Fairview Hospital, in which you had the dimensions  
10 for and the HVAC system and other information.  
11 Correct?

12 A. That is correct.

13 Q. And that because there's many variables,  
14 you could not use -- you could not predict how the  
15 Bair Hugger would react in other operating room  
16 environments.

17 A. Correct.

18 Q. And you also testified that -- withdraw  
19 that question.

20 And I was going through the documents that  
21 you reviewed.

22 Have you given any depositions in the past  
23 few years?

24 A. Yes.

25 Q. In what case?